



Eric Gonzalez  
District Attorney

DISTRICT ATTORNEY  
KINGS COUNTY  
350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** Jonathan Epps

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

---

**Disclosure # 1:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS, AGAINST MOS EPPS ARISING FROM TWO SEPARATE INCIDENTS:

1. ON OR ABOUT 02/08/2012, MOS EPPS, WHILE ASSIGNED TO PSA 4 AND DURING OFF DUTY HOURS INCIDENTS, WAS INVOLVED IN A DOMESTIC DISPUTE WITH AN INDIVIDUAL KNOWN TO THE DEPARTMENT AND THEREAFTER FAILED AND NEGLECTED TO IDENTIFY HIMSELF AS A MEMBER OF THE SERVICE TO THE RESPONDING POLICE OFFICERS.
2. ON OR ABOUT SEPTEMBER 2, 2012, MOS EPPS, WHILE OFF DUTY, WAS INVOLVED IN A PHYSICAL ALTERCATION WITH AN INDIVIDUAL KNOWN TO THE DEPARTMENT AND THEREAFTER FAILED AND NEGLECTED TO REQUEST THE RESPONSE OF A PATROL SUPERVISOR, PRECINCT OF OCCURENCE, AS REQUIRED.

CASE STATUS: CLOSED ON 05/30/2013

PENALTY: B CD ISSUED AND MOS FORFEITED THREE (3) VACATION DAYS

**Disclosure # 2:**

NYPD ENTERED A DISPOSITION OF GUILTY AGAINST MOS ARISING FROM AN INCIDENT ON 01/20/2013:

1. SAID MOS EPPS, ASSIGNED TO PSA 4, VIOLATED PATROL GUIDE, DEPARTMENT COMPUTER SYSTEMS, WHICH HE WRONGFULLY UTILIZED A DEPARTMENT COMPUTER FOR PERSONAL USE, TO WIT: SAID MOS EPPS CONDUCTED AN UNAUTHORIZED COMPUTER INQUIRY ON AN INDIVIDUAL KNOWN TO THE DEPARTMENT FOR PERSONAL REASONS.

DISPOSITION: GUILTY

CASE STATUS: CLOSED ON 10/23/2013

PENALTY: MOS EPPS FORFEITED SIX (6) VACATION DAYS AND 'B' CD ISSUED

**THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS MOS:**

**Disclosure # 3:**

CCRB CASE NO. 201600212

REPORT DATE: 01/11/2016

[REDACTED]  
[REDACTED]  
[REDACTED]

Eric Gonzalez  
District Attorney  
Kings County